

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

<p>CHARLENE CARTER, Plaintiff,</p> <p>v.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p>Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p> <p><b>PLAINTIFF CHARLENE CARTER'S RESPONSE TO SOUTHWEST AIRLINES CO.'S RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW; OR, IN THE ALTERNATIVE, FOR NEW TRIAL; OR, IN THE ALTERNATIVE, FOR REMITTITUR</b></p>
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Pursuant to Federal Rules of Civil Procedure, Rule 50(b) and 59(a), Plaintiff Charlene Carter (“Carter”), through her counsel of record, hereby responds to Defendant Southwest Airlines Co.’s (“Southwest”) renewed motion for judgment as a matter of law; or, in the alternative, for new trial; or, in the alternative, for remittitur.<sup>1</sup> Carter files her supporting brief contemporaneously with this response. The Court should deny Southwest’s motion in its entirety.

Dated: January 23, 2023

Respectfully submitted,

/s/ Matthew B. Gilliam  
Mathew B. Gilliam (*admitted pro hac vice*)  
New York Bar No. 5005996  
*mbg@nrtw.org*  
c/o National Right to Work Legal Defense  
Foundation, Inc.  
8001 Braddock Road, Suite 600  
Springfield, Virginia 22160  
Tel: 703-321-8510  
Fax: 703-321-9319

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<sup>1</sup> Doc. Nos. 386, 386-1, 387, and 387-1.

Bobby G. Pryor  
State Bar No. 16373720  
[bpryor@pryorandbruce.com](mailto:bpryor@pryorandbruce.com)  
Matthew D. Hill, Of Counsel  
State Bar No. 24032296  
[mhill@pryorandbruce.com](mailto:mhill@pryorandbruce.com)  
**PRYOR & BRUCE**  
302 N. San Jacinto  
Rockwall, TX 75087  
Telephone: (972) 771-3933  
Facsimile: (972) 771-8343

*Attorneys for Plaintiff Charlene Carter*

**Certificate of Service**

I hereby certify that on January 23, 2023, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Matthew B. Gilliam

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